



Maine Organic Farmers and Gardeners Association

Common Ground Country Fair

June 12, 2006

Mark Bradley, Associate Deputy Administrator
USDA-AMS-TMP-NOP
Room 4008-South Building
1400 Independence Avenue, S
Washington, DC 20250-0020

Comments on: ANPR 7CRF part 205 Docket [TM- 05-14] RIN 0581-Ac57

Dear Mr. Bradley,

Maine Organic Farmers and Gardeners Association MOFGA thanks the USDA for requesting public comment on this potential change to the NOP Organic Rule. It is MOFGA's opinion that the regulations must be clear for the farmers and enforceable by the certifying agencies.

We agree with the Northeast Organic Dairy Producers Alliance (NODPA) in supporting the NOSB recommendation for a requirement that 30% of the cows daily dry matter intake should be from pasture from the age of 6 months and older, regardless of the stage of production, and that the cows should be pastured for a minimum of 120 days of the year. This requirement is achievable by the farmers. It is also measurable by the feed charts that certifiers are already using as part of the Organic System Plans. It will cause no undue stress on the farmers or the certifiers and will result in a situation in which the farmers are accountable for their practices. This will satisfy the consumers who expect that milking cows are grazing for their feed.

Consumer preferences:

Is there evidence, data, or other types of research that the role of pasture as it exists in the regulation does not support consumers' beliefs about the relationship between organic milk and organic dairy cows?

Lack of enforcement, on some operations, of the current Rule requirement for the pasturing of ruminants, including lactating dairy cows, has led to the necessity for the inclusion of the above numerical standards in the guidance document. Without clear, definitive wording, the intent of the Rule, with regards to pasture, will continue to be disregarded by some. The NOSB wording gives certifiers an explicit minimum amount of grazing intake and minimum allowable grazing season that will serve as a clear-cut trigger/ guide in their certification process.

Access to pasture:

Is there evidence in dairy or animal science literature that supports an appropriate minimum amount of time that dairy cows (or other ruminant animals) should be kept on pasture?

Is there evidence in dairy or animal science literature that supports a minimum amount of feed that should come from pasture?

Ruminants have developed as a sub order to consume a major part of their diet from roughages. In the pasture season this should be in the form of pasture for many reasons. The testimonies by Linda Tikofsky DVM from Cornell University, and Lisa McCrory at the Pasture Symposium and the NOSB guidance recommendation of February 2005 all include extensive examples of research that has been done regarding the value of pasture for dairy cattle.

Ruminant Animal Nutrition

What would the effect be to require a minimum of dry matter intake of 30% derived from pasture? Is this an achievable goal? What evidence is available to support 30% as a benchmark?

A requirement of a minimum of 30% dry matter from edible pasture for 120 days of the pasture season is achievable by farms across the United States. This requirement was decided upon by the NOSB after much consultation and agreement with farmers in different environment throughout the country. All the organic dairy producer organizations in the country have commented in favor of this recommendation. In Maine a quarter of the farms feed nearly no stored feed during the pasture season.

Is it useful to establish a single benchmark or measure, such as a minimum DMI, for all dairy operations in the United States and all foreign organic operations who want to be certified to the NOP standard?

We feel that having a benchmark is critical for farmers to know what is expected of them and for certifiers to use in evaluation of the OSP. It will keep the requirements equal for all certified farms.

Measurement, enforcement, and compliance:

How would an accredited certifying agent appropriately measure compliance with specific measures adopted to change the role of pasture? For example if dry matter intake is used as a benchmark, should it be measured as the average DMI over a certain period, such as a calendar year for average 12 months?

How should producers and certifying agents verify compliance over time for a herd of cows that are at various stages of growth or have varying stated of nutritional needs? Can the producer and certifying agent determine this in the organic system plan?

As we stated above: It is measurable by the feed charts that certifiers are already using as part of the Organic System Plans.

We firmly believe requiring a minimum of 30% dry matter from edible pasture for 120 days of the pasture season for ruminants, promotes a sustainable agricultural system, providing multiple benefits to the animals, environment and the consumers of organic products. Providing cows with access to pasture assures that organic principles are being met, with an interrelated system between the animals and the land, working from the soil up to promote an interdependent community. Ruminants with access to pasture help ensure an organic production system that provides living conditions that allow animals to satisfy their natural behavior patterns, provides the animals with preventative health care benefits, and improves humane animal care and their welfare. It is what is expected by the consumers of organic products.

Thank you for your time,

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